

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**  
**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2009

Date filed: February 27, 2009

Name of company covered by this certification: Independence Telecommunications Utility

Form 499 Filer ID: 825886

Name of signatory: William J Runge

Title of signatory: Telecommunications Manager

I, William Runge, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules <attached>.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI , and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed \_\_\_\_\_

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Reference: Paragraph 2; section 64.2001

It is the policy passed by our Board of Directors that in compliance with both the rules and regulations for CPNI and Red Flag Rules that under no circumstance will customer information be shared or released without prior written consent of that individual whom can also furnish a valid government issued form of id. In the event a customer calls in to request account information, they must first provide a PIN identifier before any information is divulged. In the event a customer does not have a PIN number, they must come to our office and provide a Government Issue form of id before a PIN or account information is released.

Under any circumstance is customer information not shared or released to third party or databroker(s).

In the event it is found that any company employee is found to have improperly used their responsibility or authority will be reprimanded and/or terminated.

Our CPNI and Red Flag rules and policies are reviewed with each employee annually as so a clear and defined understanding of these policies are understood.